

FILED

JUL 11 2014

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS OFFICE

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ROBERT E. GODSEY,

Defendant.

CRIMINAL NO. 14-mj-3076-DGW

Title 18, United States Code,
Sections 2252(a)(2) and (a)(4)(B)

CRIMINAL COMPLAINT

I, Special Agent John Taylor of the Department of Homeland Security - Homeland Security Investigations, being duly sworn, states the following is true and correct to the best of my knowledge and belief:

COUNT 1

DISTRIBUTION OF VISUAL DEPICTIONS OF MINORS ENGAGED IN SEXUALLY EXPLICIT CONDUCT

From on or about December 2012 until on or about June 6, 2013, in Madison County, in the Southern District of Illinois,

ROBERT E. GODSEY,

defendant herein, did knowingly distribute visual depictions using any means or facility of interstate or foreign commerce; and that had been shipped and transported in or affecting interstate or foreign commerce, by any means including by computer; and the production of which visual depiction involved the use of a minor engaging in sexually explicit conduct and which visual depiction was of such conduct, all in violation of Title 18, United States Code, Section 2252(a)(2).

COUNT 2

RECEIPT OF VISUAL DEPICTIONS OF MINORS ENGAGED IN SEXUALLY EXPLICIT CONDUCT

From on or about December 2012 until on or about June 6, 2013, in Madison County, within the Southern District of Illinois,

ROBERT E. GODSEY,

defendant herein, did knowingly receive visual depictions using any means or facility of interstate or foreign commerce; and that had been shipped and transported in or affecting interstate or foreign commerce, by any means including by computer; and the production of which visual depiction involved the use of a minor engaging in sexually explicit conduct and which visual depiction was of such conduct, all in violation of Title 18, United States Code, Section 2252(a)(2).

COUNT 3

POSSESSION OF VISUAL DEPICTIONS OF PREPUBESCENT MINORS ENGAGED IN SEXUALLY EXPLICIT CONDUCT

On or about July 10, 2014, in Madison County, within the Southern District of Illinois,

ROBERT E. GODSEY,

defendant herein, did knowingly possess one or more matters, including, but not limited to, a Samsung, notebook computer, bearing serial number HOLFG1BC802600T, and a Maxtor One Touch External Hard Drive, bearing serial number 9NT2A2-500, and a Western Digital External Hard Drive, bearing serial number WMAES3987543, that contained visual depictions that involved a prepubescent minor and a minor who had not attained 12 years of age that had been

shipped and transported using any means or facility of interstate or foreign commerce, or in or affecting interstate or foreign commerce, and which were produced using materials which had been mailed or so shipped and transported, by any means, including by computer; the production of which involved the use of a minor engaging in sexually explicit conduct, and which visual depictions were of such conduct; all in violation of Title 18, United States Code, Section 2252(a)(4)(B) and (b)(2).

AFFIDAVIT

I further state that I am a Special Agent with the Department of Homeland Security (DHS), Homeland Security Investigations (HSI), and that this complaint is based on the following facts:

1. I am a SA with DHS - HSI assigned to the Resident Agent in Charge in St. Louis, Missouri. I have been in Federal Law Enforcement for over 10 years. I have investigated matters involving the exploitation of children, particularly in relation to violations of Title 18, United States Code, Sections 2251, 2252 and 2252A, which criminalize the production, possession, receipt, distribution and transmission of child pornography. I have received training in the area of child pornography and child exploitation, and have had the opportunity to observe and review numerous examples of visual depictions of minors engaged in sexually explicit behavior in all forms of media including computer media. I have personally participated in over 100 investigations involving the sexual exploitation of children. I have also personally participated in the execution of search warrants, many of which involved child sexual exploitation offenses.

2. My investigation into possible criminal activity of Robert GODSEY began in May 2014. At that time, I received information that from HSI Detroit that one of their targets had traded images of child pornography with an e-mail address, *sarahstone2002@gmail.com*, that was eventually linked to GODSEY in December 2012 and June 2013. I was provided these images and, based on my training and experience, confirmed that they were visual depictions of minors engaged in sexually explicit conduct.

3. My investigation also revealed that there was a previous investigation into the e-mail address *sarahstone2002@gmail.com* by another federal agency after that federal agency received a cyber-tip report from the National Center for Missing and Exploited Children (NCMEC) which conveyed that the user of email address *sarahstone2002@gmail.com* attempted to e-mail over twenty (20) images of child pornography to another e-mail address on June 5, 2013. The investigation by this federal agency was the investigation which eventually resulted in the identification of Robert GODSEY as the owner of the *sarahstone2002@gmail.com* e-mail account.

4. At the time of these prior investigations, GODSEY lived in an apartment in Marine, Illinois. He subsequently moved to a residence in Alhambra, Illinois.

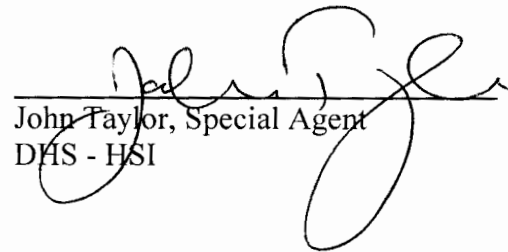
5. On July 8, I applied for and obtained a federal search warrant for the Alhambra address to search the residence for any evidence of child pornography offenses that may have been committed by GODSEY

6. On July 10, 2014, I and other agents executed the search warrant while GODSEY was present at the residence. Among items seized from the house were the following: a Samsung, notebook computer, bearing serial number HOLFG1BC802600T, and a Maxtor One Touch External Hard Drive, bearing serial number 9NT2A2-500, and a Western Digital External Hard Drive, bearing serial number WMAES3987543; all of which were seized from GODSEY's bedroom. GODSEY admitted that these items belonged to him. A forensic preview was conducted of the notebook computer, and it revealed images and videos of minors engaged in sexually explicit conduct. At the house, GODSEY admitted knowing that there would be visual depictions of minors engaged in sexually explicit conduct on the notebook computer located in his bedroom. He said that he had been collecting child pornography for many years, and trades the child pornography using the *sarahstone2002@gmail.com* e-mail account.

7. Later that same day, I interviewed GODSEY, who provided a voluntary, videotaped statement, after waiving his *Miranda* rights, at the Madison County Sheriff's Department. GODSEY again admitted to collecting images and videos of child pornography since he was approximately 17 years old (he is approximately 34 years old now). He also again admitted trading images and videos of child pornography with other collectors of child pornography via the internet, a facility of interstate commerce. He, therefore, both received and distributed visual depictions of minors engaged in sexually explicit conduct using a facility of interstate commerce, namely the internet. GODSEY estimated that he had approximately 600 videos and over 1,000 images of minors engaged in sexually explicit conduct on the notebook computer. GODSEY stated that he was the only user of the computer, and that some of the minors depicted in the images and/or videos were under the age of twelve.

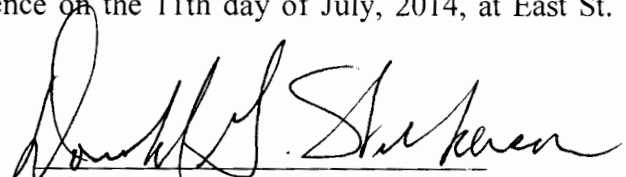
8. Some or all of the components of the Samsung, notebook computer, bearing serial number HOLFG1BC802600T, would have been manufactured outside of the State of Illinois, and therefore would have been shipped and transported using any means or facility of interstate or foreign commerce, or in or affecting interstate or foreign commerce. In addition, the images possessed on the Samsung notebook computer had been produced on the computer via the internet, a facility of interstate commerce.

FURTHER AFFIANT SAYETH NAUGHT.

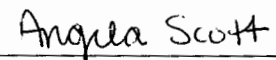

John Taylor, Special Agent
DHS - HSI

State of Illinois)
) SS
County of St. Clair)

Sworn to before me and subscribed in my presence on the 11th day of July, 2014, at East St. Louis, Illinois.


DONALD G. WILKERSON
United State Magistrate Judge

STEPHEN R. WIGGINTON
United States Attorney


ANGELA SCOTT
Assistant United States Attorney